

From: Angela France <afrance@pctlg.com>
Subject: Follow up
Date: June 22, 2010 9:15:24 PM EDT
To: "Weinberg, Don" <Dweinberg@dglitigators.com>
Cc: Michael Eisenberg <michael@eisenberg-lawoffice.com>



Dear Don,

Mike and I are available tomorrow, Wednesday, at 1:30 pm if that works for you. We propose some dates below to help facilitate our discussion.

Summary Judgment Briefing:

- summary judgment motions due by Friday, September 3, 2010
- oppositions due by Friday, September 17, 2010
- replys due by Friday, September 24, 2010

Exchange of Exhibit and Witness Lists:

- about a month before trial, Monday, September 20, 2010
- objections to lists due 10 days thereafter on Thursday, September 30, 2010

In addition, we wanted to follow up with you on a couple outstanding items. (1) We haven't received confirmation that the proposed order regarding plaintiff's personnel file is fine with you. Mike sent the proposed order to everyone on June 14th. If you have any requested revisions, let us know as soon as possible. (2) Judge Jones order regarding Plaintiff's motion to compel documents on June 16th required defendant to immediately produce the non-work product documents to plaintiff. As of today, we have not received any documents and defendant has not otherwise filed an objection to this ruling.

Look forward to speaking with you tomorrow regarding these issues. Thanks in advance.

Angela

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